

**HEARING TIME AND DATE: (TBD)**

**OBJECTION DEADLINE: October 25, 2019**

**REPLY DEADLINE: November 15, 2019**

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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

PERFORADORA ORO NEGRO, S. DE R.L.  
DE C.V., *et al.*

Debtors in a Foreign Proceeding.

Chapter 15

Case No. 18-11094 (SCC)  
(Jointly Administered)

GONZALO GIL-WHITE, PERSONALLY  
AND IN HIS CAPACITY AS FOREIGN  
REPRESENTATIVE OF PERFORADORA  
ORO NEGRO, S. DE R.L. DE C.V. AND  
INTEGRADORA DE SERVICIOS  
PETROLEROS ORO NEGRO, S.A.P.I. DE  
C.V.

Plaintiff,

-against-

ALP ERCIL; ALTERNA CAPITAL  
PARTNERS, LLC;  
AMA CAPITAL PARTNERS, LLC;  
ANDRES CONSTANTIN ANTONIUS-  
GONZÁLEZ; ASIA RESEARCH AND  
CAPITAL MANAGEMENT LTD.; CQS

Adv. Pro. No. 19-01294

(UK) LLP; FINTECH ADVISORY, INC.;  
DEUTSCHE BANK MÉXICO, S.A.,  
INSTITUCIÓN DE BANCA MÚLTIPLE;  
GARCÍA GONZÁLEZ Y BARRADAS  
ABOGADOS, S.C.; GHL INVESTMENTS  
(EUROPE) LTD.; JOHN FREDRIKSEN;  
KRISTAN BODDEN; MARITIME  
FINANCE COMPANY LTD.; NOEL BLAIR  
HUNTER COCHRANE, JR; ORO NEGRO  
PRIMUS PTE., LTD.; ORO NEGRO  
LAURUS PTE., LTD.; ORO NEGRO  
FORTIUS PTE., LTD.; ORO NEGRO  
DECUS PTE., LTD.; ORO NEGRO  
IMPETUS PTE., LTD.; PAUL MATISON  
LEAND, JR.; ROGER ALAN BARTLETT;  
ROGER ARNOLD HANCOCK; SEADRILL  
LIMITED; SHIP FINANCE  
INTERNATIONAL LTD.; and DOES 1-100

Defendants.

**NOTICE OF HEARING TO CONSIDER MOTION OF  
SEADRILL LIMITED AND FINTECH ADVISORY INC.  
TO DISMISS COMPLAINT FILED BY DEBTORS**

**PLEASE TAKE NOTICE** that on August 26, 2019, Seadrill Limited and Fintech Advisory Inc. (collectively, “Movants”), filed a motion (the “Motion to Dismiss”) in the Bankruptcy Court, pursuant to Federal Rule of Civil Procedure 12(b), as it is incorporated into Rule 7012(b) of the Federal Rules of Bankruptcy Procedure, to dismiss the Complaint filed in the above-captioned Adversary Proceeding [ECF ## 1,4 & 9] by Gonzalo Gil-White, Personally and in his Capacity as Foreign Representative of Perforadora Oro Negro, S. De R.L. De C.V. and Integradora De Servicios Petroleros Oro Negro, S.A.P.I. De C.V., the debtors herein (collectively, the “Debtors”).

**PLEASE TAKE FURTHER NOTICE**, that, pursuant to a Stipulation between the Debtors, Movants and other defendants [ECF #8], Debtors shall file any opposition (the

“Objection”) to the Motion to Dismiss on or before October 25, 2019 and Movants shall file any responses to the Objection on or before November 15, 2019. A hearing on the Motion to Dismiss will be held at a time and location to be determined by the Bankruptcy Court.

Dated: New York, New York  
August 26, 2019

**WILK AUSLANDER LLP**

By: /s/ Julie Cilia  
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